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April 26, 2023

VIA ECF

Honorable Michael A. Hammer, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Veronica Doe v. Rutgers University, et al.*
Civil Action No. 21-20763 (EP) (MAH)

Dear Judge Hammer:

Our firm represents Defendants in this matter. As a result of a further agreement reached between the parties, we write to respectfully request another modification of the March 6, 2023 Amended Scheduling Order (ECF No. 63) and the March 28, 2023 Amended Scheduling Order (ECF No. 66).

Paragraph 4 of the March 6, 2023 Amended Scheduling Order (ECF No. 63) provided that “All responding expert reports shall be delivered by April 28, 2023.” That deadline was amended by the March 28, 2023 Amended Scheduling Order to provide that “Defendants’ responding expert to Dr. Bazzi [plaintiff’s psychiatric expert] can likewise extend their expert report deadline to April 28, 2023 to May 8, 2023.” We now respectfully request that the deadline for rebuttal reports from defendants’ expert psychiatrist and expert economist be extended to May 31, 2023. Plaintiff has consented to this request.

Good cause exists for the requested extension. Specifically, as a result of the parties’ recent amicable resolution of a discovery issue, plaintiff has just moments ago produced the reports of certain psychological tests that were administered to plaintiff by plaintiff’s psychiatric expert. The parties have further agreed that following evaluation of the test reports by defendants’ experts, plaintiff will make herself available on a mutually agreeable date for a videoconference examination by defendants’ psychiatric expert. The requested extension of time will allow for the foregoing, and for defendants’ psychiatric expert to thereafter prepare a rebuttal expert report. A similar extension of time is needed for defendants to produce the rebuttal report of their expert economist, because the economist’s opinion will necessarily be largely dependent on the opinion of defendants’ psychiatric expert as to plaintiff’s psychiatric injury.

If Your Honor is amenable to the foregoing, we respectfully request the Court execute the So Ordered provision below and have its Order filed with the Clerk of Court.

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We thank the Court for its consideration and assistance. If the Court has any questions, we are available to respond at the Court's convenience.

Respectfully submitted,

s/ Sean R. Kelly

SEAN R. KELLY

cc: Counsel of Record (via ECF)

SO ORDERED this 26th day of April, 2023:

s/ Michael A. Hammer

HONORABLE MICHAEL A. HAMMER, U.S.M.J.